

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00401 HG
)	
vs.)	
)	
GEORGE KEAHI, JR.,	(01)) DECLARATION OF JACK SCHWEIGERT, ESQ.
aka "Uncle Louie,")	
aka "Opelu,")	
BRIAN U'U,	(02))
ARNOLD C. ARRUIZA	(03))
MARY H. VANDERVELDE,	(04))
CHRIS TOLBERT	(05))
)	
Defendant.)	

DECLARATION OF JACK SCHWEIGERT, ESQ.

I, Jack Schweigert, Esq., declare as follows:

1. I am Defendant Mary H. Vandervelde's court appointed counsel in this case.

2. Ms. Vandervelde's sentencing is now set for February 17, 2006.

3. I believe Ms. Vandervelde has psychological issues that if evaluated and testified to by a licensed psychologist could influence the court in her sentencing. The basis of my opinion is from my own discussions with the Defendant as well as the report submitted by Ms. Dee White dated December 15, 2005, a true and correct copy of which is attached hereto as Exhibit 1, along with Ms. White's curriculum vitae.

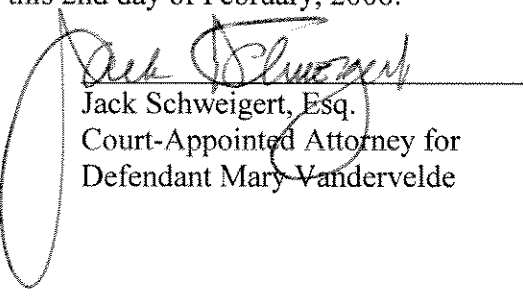
4. Dr. Brenda Andrieu is a licensed psychologist whose address is 550 Halekauwila Street, Suite 200, Honolulu, Hawaii 96813, and is qualified to study and evaluate the Defendant as far as her intellectual ability and her psychological history. Dr. Andrieu's curriculum vitae and fee requirements are attached hereto as Exhibit 2.

5. I believe the Court's hiring of Dr. Andrieu as an expert to be a necessary expense for defense of Ms. Vandervelde the terms that Dr. Andrieu agrees to perform this service are set forth in her declaration, a true and correct copy of which is attached hereto as Exhibit 3.

6. Based on the foregoing, I believe the defense needs to hire Dr. Andrieu as an expert witness to psychologically evaluate Ms. Vandervelde, to prepare a report on her findings, and testify at Ms. Vandervelde's sentencing hearing on February 17, 2006 at government expense.

I declare under penalty of perjury the foregoing is true and correct.

Executed in Honolulu, Hawaii, this 2nd day of February, 2006.



Jack Schweigert, Esq.
Court-Appointed Attorney for
Defendant Mary Vandervelde